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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 JEAN-MARC BOUJU,

11 Plaintiff,

12 v.

13 THE PRUDENTIAL INSURANCE
14 COMPANY OF AMERICA,

Defendant.

Case No. 2:17-cv-01478-RSM

**STIPULATED MOTION AND
ORDER RE EXTENSION OF
DISCOVERY DEADLINES**

15 Plaintiff Jean-Marc Bouju, by and through his attorney, and Defendant The Prudential
16 Insurance Company of America (“Prudential”), by and through its attorneys, file this Stipulation
17 and respectfully request that this Court issue an Order extending the upcoming discovery
18 deadlines by ten (10) business days, specifically until March 30, 2018 for filing of motions related
19 to discovery and April 30, 2018 for the deadline to complete discovery. In support of this
20 Stipulation, the parties state:

21 1. Plaintiff filed his Complaint on September 29, 2017 and served Prudential on
22 October 5, 2017.

23 2. Prudential filed an Answer to the Complaint on November 2, 2017.

24 3. On November 16, 2017, the Court entered a Scheduling Order, requiring, in
25 relevant part, that motions related to discovery be filed by March 16, 2018 and that the parties
26 complete discovery by April 16, 2018.

27 4. On February 23, 2018, Plaintiff served Interrogatories and Requests for
STIPULATED MOTION AND ORDER RE EXTENSION OF
DISCOVERY DEADLINES

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LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 Production of Documents on Prudential. Plaintiff has agreed to extend the deadline for
2 Prudential's responses by 10 business days, or April 6, 2018.

3 5. The Parties are actively engaged in the discovery process (including addressing
4 the appropriate scope of discovery) but are also discussing possible resolution of the case. This
5 extension will allow the parties to dedicate resources to exploring the resolution of the case,
6 rather than continuing to pursue potentially unnecessary litigation.

7 5. On March 13, 2018, Counsel for Prudential conferred with Counsel for Plaintiff
8 regarding this extension and the Parties agree that a ten (10) business day extension to file
9 motions related to discovery and to extend the deadline for completion of discovery would assist
10 in facilitating productive settlement negotiations.

11 5. This motion is filed before the discovery and dispositive motions deadlines and is
12 sought in good faith and not for the purpose of unwarranted delay. No party will be prejudiced
13 by the requested extension of time and this extension will not affect any other deadlines in the
14 case.

15 6. The Parties have not previously requested an extension of time in this matter.

16 THEREFORE, the parties respectfully request that the Court issue an order extending the
17 deadline to file motions related to discovery to March 30, 2018, and the discovery completion
18 deadline to April 30, 2018.

19 DATED: March 13, 2018

DATED: March 13, 2018

20 THE WOOD LAW FIRM

LANE POWELL PC

21 By s/ John Walker Wood
22 (via e-mail authorization)
23 John Walker Wood
24 The Wood Law Firm, PLLC
25 800 5th Avenue, Suite 4100
26 Seattle, WA 98104
27 (206) 650-0765
john@woodfirm.com

Attorneys for Plaintiff

By s/David W. Howenstine
D. Michael Reilly
reillym@lanepowell.com
David W. Howenstine
howenstined@lanepowell.com
LANE POWELL P.C.
1420 Fifth Avenue, Suite 4200
P.O. Box 91302
Seattle, WA 98111-9402
Telephone: (206) 223-7000
Facsimile: (206) 203-7107

1
2 By s/ Shelley R. Hebert
3 Ian H. Morrison (admitted PHV)
4 imorrison@seyfarth.com
5 Shelley R. Hebert (admitted PHV)
6 shebert@seyfarth.com
7 Seyfarth Shaw LLP
8 233 South Wacker Drive, Suite 8000
9 Chicago, IL 60606
10 Telephone: (312) 460-5000
11 Facsimile: (312) 460-7000

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13 *Attorneys for Defendant The Prudential Life*
14 *Insurance Company of America*
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1 **ORDER**

2 Having considered the Parties' Joint Stipulated Motion Requesting an Extension
3 of Discovery Deadlines and being sufficiently advised, the Court hereby ORDERS as
4 follows:

5 IT IS ORDERED that the MOTION be granted and that the deadline to file motions
6 related to discovery is extended to March 30, 2018 and the discovery deadline is extended
7 to April 30, 2018.

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9 DATED this 14th day of March 2018.

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11 RICARDO S. MARTINEZ
12 CHIEF UNITED STATES DISTRICT JUDGE
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